

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**



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Order Instituting Rulemaking to Establish
Policies, Processes, and Rules to Ensure
Reliable Electric Service in California in the
Event of an Extreme Weather Event in 2021.

Rulemaking 20-11-003
(Filed November 19, 2020)

**MOTION OF VALLEY CLEAN ENERGY ALLIANCE, POLARIS ENERGY
SERVICES, AND TEMIX INC. TO SHORTEN TIME TO RESPOND TO PETITION
FOR MODIFICATION OF D.21-12-015**

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January 31, 2022

*On Behalf of Valley Clean Energy Alliance,
Polaris Energy Services, and TeMix Inc.*

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Pursuant to Rule 11.1 of the Commission’s Rules of Practice and Procedure, Valley Clean Energy Alliance (“VCE”) , Polaris Energy Services, and TeMix Inc. (together, “Pilot Partners”) respectfully request a ruling shortening time for responses to the Pilot Partners’ Petition for Modification of D.21-12-015 (“PFM”) and for comments on the Commission’s Proposed Decision resolving the PFM.

The PFM requests the Commission modify D.21-12-015 to authorize explicitly VCE administrative costs for the VCE agricultural irrigation pumping dynamic rates pilot (“Pilot”) approved in D.21-12-015. The PFM also requests that, if the Energy Division determines that Commission resolution of VCE’s Advice Letter 11-E will require modification of D.21-12-015, the relief requested in VCE’s reply to PG&E’s Protest (“Reply”) be incorporated into the proposed decision resolving the PFM. This Motion to Shorten Time is being filed and served concurrently with the PFM and VCE’s Reply. The Pilot Partners request a ruling shortening the time for parties to respond to the PFM from 30 days to 10 days and to shorten the time for opening comments on a proposed decision resolving this PFM from 20 days to 10 days.

D.21-12-015 requires the Pilot to launch by May 1, 2022. Yet, D.21-12-015 did not make explicit provision for VCE’s administrative costs to run the AG Pilot. Resolution of the administrative budget for VCE is time-critical as VCE must pay its vendors, as it is authorized to do in D.21-12-015 in order to move forward in implementing the Pilot. Moreover, resolution of

the issues of disagreement between PG&E and VCE regarding Pilot implementation is also time-critical, as such disagreement is preventing PG&E from remitting both data and Pilot budget authorized under D.21-12-015 to VCE. If such issues cannot be resolved via the Energy Division's disposition of VCE's Advice Letter 11-E, then such issues should be resolved by the Commission in a proposed decision on the Pilot Partners' PFM, as soon as possible. Therefore, the PFM requested that the Commission expeditiously approve the PFM requested relief.

To enable VCE to launch the Pilot by May 1, 2022 as required by D.21-12-015, the Pilot Partners are filing this motion to shorten time for parties to respond to the PFM, from 30 days to 10 days, and to shorten time for opening comments on the Commission's proposed decision on the PFM to 10 days. The Pilot Partners respectfully request the relief described herein.

Respectfully submitted,

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